National Advisory Committee on Meat and Poultry Inspection
August 8-9, 2007

Subcommittee 2 Report

Issue: *Pilot Project to Explore Mechanisms for Sharing Industry Data with FSIS*

The Subcommittee was presented the following questions by the Agency.

1. What type of industry data would be appropriate for use in a risk-based inspection (RBI) algorithm for use in processing establishments? For example:
a. Presence/absence, enumeration, serotype/subtype data for pathogens in products?
b. Plant environmental monitoring data, including presence/absence, enumeration, serotype/subtype data for pathogens?
c. Volume data?
d. Other data?
Please provide rationale as to why various types of data would be appropriate and beneficial for use in RBI.

2.What type of industry data would be appropriate for use in a public health-based inspection algorithm for use in slaughter establishments? For example:
a. Presence/absence, enumeration, serotype/subtype data for pathogens in products?
b. Plant environmental monitoring data, including presence/absence, enumeration, serotype/subtype data for pathogens?
c. Volume data?
d. Other data?
Please provide rationale as to why various types of data would be appropriate and beneficial for use in public health-based inspection

3. How should the Agency obtain the data (i.e. mechanism of collection)?
a. Direct from industry to FSIS databases via the internet (with secured identity)?
b. Contract laboratory data?
c. Collection as part of inspection activity by FSIS inspectors of industry records/information?
Please provide rationale for any recommended mechanisms of data collection.

4. If industry data are used, how does FSIS ensure data quality (e.g. verification by FSIS inspectors, use of standardized methods and laboratory certification, use of third-party audits, etc.)?
Please provide rationale as to why various methods would/could ensure data quality.

The Subcommittee provided the following recommendations to the Agency.

1. What type of industry data would be appropriate for use in a risk-based inspection (RBI) algorithm for use in processing establishments? For example:
a. Presence/absence, enumeration, serotype/subtype data for pathogens in products?
b. Plant environmental monitoring data, including presence/absence, enumeration, serotype/subtype data for pathogens?
c. Volume data?
d. Other data?
Please provide rationale as to why various types of data would be appropriate and beneficial for use in RBI.

The Subcommittee acknowledges that, while a voluntary pilot project to collect and possibly use industry data could be a valuable exercise, there are a large number of challenges and limitations such as current methodologies, economics and data interpretation that must be considered.

The Subcommittee suggests FSIS first provide a clear objective for the application of the data including specific data requirements for the voluntary pilot. If the data needs would include confidential, commercial and proprietary information, FSIS must consult the Office of General Counsel for a legal opinion on collection, use and release of these data.

Regarding the types of industry data appropriate for use in a risk-based inspection (RBI) system for processing establishments, the subcommittee suggests that several types of data could be most useful, each type with its own limitations. The subcommittee recognizes that data should be applicable to all segments of the industry (plant size, volume, product, etc.) when considered for use with the RBI system. In order to use these data as part of the RBI system, consideration must be given for ensuring the integrity and accuracy of the data as well as protecting proprietary information. To ensure this, FSIS must implement systems to verify the validity and usefulness of the data.

Presence/absence of pathogens or their indicators in products could be the most useful, but consideration must be given that industry testing schemes vary widely in design, purpose, and intent.

Serotype/enumeration data may be useful for some products when available.

Environmental testing presence/absence data for pathogens/indicators could be useful, particularly in ready-to-eat (RTE) establishments. Again, results must be viewed with consideration of the design and purpose of the testing protocol.

Volume data can be an important consideration, especially if ranges are defined and utilized. Questions remain about whether volume should be expressed as “produced” or “shipped”. Also, plant records are not categorized the same way from plant to plant. Seasonal variation in production also occurs in many establishments and must be considered.

Specifics of a potential pilot project around volume data would be developed by the agency and worked in conjunction with the subcommittee on data analysis.

Other Data

Sanitation effectiveness monitoring/verification data could be useful, especially for facilities utilizing objective techniques such as bioluminescence assays.

Implementation of pathogen interventions data from interventions could be useful, but must be considered in the context of validation information documenting effectiveness of the intervention as applied in the specific plant(s).

***2.What type of industry data would be appropriate for use in a public health-based inspection algorithm for use in slaughter establishments? For example*:**
a. Presence/absence, enumeration, serotype/subtype data for pathogens in products?
b. Plant environmental monitoring data, including presence/absence, enumeration, serotype/subtype data for pathogens?
c. Volume data?
d. Other data?
Please provide rationale as to why various types of data would be appropriate and beneficial for use in public health-based inspection

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c. Collection as part of inspection activity by FSIS inspectors of industry records/information?
Please provide rationale for any recommended mechanisms of data collection.

FSIS should be prepared to use a variety of mechanisms to collect data. Establishments vary in their technological capabilities and financial resources and may not all be able to submit data in the same way.

The Agency may need to form a large, selected sample group from which to solicit volunteer establishments to avoid self-selection bias. The pilot project should be large enough to be sufficiently representative of the industry. A sufficient review and analysis of the pilot procedures/protocols should be conducted by the NACMPI Subcommittee on Data Analysis, in conjunction with the DAIG, before commencement of the pilot.

4. If industry data are used, how does FSIS ensure data quality (e.g. verification by FSIS inspectors, use of standardized methods and laboratory certification, use of third-party audits, etc.)?
Please provide rationale as to why various methods would/could ensure data quality.

The subcommittee recommends FSIS use the resources available to ensure that minimum acceptable standards for microbiological/laboratory methodologies (i.e. sampling) be formalized prior to the commencement of the pilot.

Establishments must submit the methodology in use along with any pertinent documentation to ensure the minimum standards mentioned above are met.

The pilot should begin with a simple plan. FSIS should identify the resources necessary to verify the data and clearly define the role of its workforce in this pilot program.